# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
HOUSTON REAL ESTATE PROPERTIES, LLC Debtor.	\$ \$ \$ \$	
JOHN QUINLAN, OMAR KHAWAJA, AND OSAMA ABDULLATIF Movants,	\$ \$ \$ \$	CASE NO. 22-32998 (Chapter 7)
v.  HOUSTON REAL ESTATE PROPERTIES, LLC, ET AL Respondent.	\$ \$ \$ \$ \$	Case No. 23-03141 Adversary Proceeding

# MOVANTS' WITNESS AND EXHIBIT LIST

John Quinlan, Omar Khawaja, and Osama Abdullatif ("Movants"), designate the following exhibits and witnesses that may be used or called in connection with the above-referenced matter and adopts all other exhibits and exhibit lists submitted by all other parties as its own by reference, reserving its right to object to any of those exhibits.

#### Witnesses:

1.	Osama Abdullatif	Judge: Jeffrey P. Norman			
2.	Any witness designated by another party	Hearing Date: August 31, 2023			
3.	Any witness called by any other party	Hearing Time: 10:00 a.m.			
4.	Any witness necessary for rebuttal	Parties' Name: Movants			
		Attorney: Steven A. Leyh/Michael Ballases			
		<b>Attorney Phone:</b> (713) 977-8686			
		Nature of Proceeding:			
		John Quinlan, Omar Khawaja, and Osama			
		Abullatif's Motion for Expedited			
		Consideration (Dkt. No. 22)			

## **Exhibit List:**

No.	Description	Offer	Obj.	Admitted	Not Admitted
1.	Shepherd-Huldy Development I, LLC: Certified Copy of Foreclosure sale and with Deed – 2503 S. Shepherd Dr.; 2421 Shepherd Dr.; 2502 Huldy St.; and 2424 Huldy St.				
2.	9201 Memorial Dr. LLC: Certified Copy of Foreclosure Notice with Deed – 9201 Memorial Drive.				
3.	2727 Kirby 26L LLC: Certified Copy of Foreclosure Notice with Deed – 2727 Kirby 26L.				
4.	Any other exhibit offered by opposing counsel.				

Movants incorporate in the Exhibit List the pleadings and other papers filed in this case, related proceedings and other court filings, as permitted by the rules and applicable authority, including Federal Rules of Evidence Rule 201 and request the Court take judicial notice of those documents if requested. Movants further reserve the right to introduce or rely upon any exhibit designated by any party and to introduce any exhibit, document, or information to rebut or impeach any statement or testimony.

DATED: August 30, 2023.

# Respectfully submitted,

# HOOVER SLOVACEK, LLP

By: <u>/s/ T. Michael Ballases</u>

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ATTORNEYS FOR MOVANTS, JOHN QUINLAN, OMAR KHAWAJA, and OSAMA ABULLATIF

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this Witness and Exhibit List was served electronically upon each of the parties listed on the Court's ECF Service List maintained in this case on August 30, 2023.

# 23-03141 Notice will be electronically mailed to:

Thomas Michael Ballases on behalf of Plaintiff John Quinlan ballases@hooverslovacek.com

Thomas Michael Ballases on behalf of Plaintiff Omar Khawaja ballases@hooverslovacek.com

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## 23-03141 Notice will be emailed to:

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